

District Judge James L. Robart

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

JULIO CURY, *et al.*,

Plaintiffs,

v.

DEPARTMENT OF STATE, *et al.*,

Defendants.

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Civil Action No.: 2:23-cv-00499-JLR

PLAINTIFFS' UNOPPOSED
MOTION FOR AN EXTENSION OF
TIMENoted for Consideration:
December 30, 2024

NOW COME Plaintiffs to respectfully request a one-week extension of all pending deadlines due to a significant and unforeseen increase in the undersigned's workload in the last week. The undersigned has an administrative hearing scheduled for 8 January 2025 in a complex security clearance appeal, and at the end of last week he encountered a significant issue regarding an expert witness which required several days of work to resolve. As a result, he was required to move practically all of the scheduled witness preparation meetings to this week on short notice, which has not left him any time to complete his brief in this case by the scheduled 3 January deadline. While he admittedly only needs approximately 2-3 additional days to complete his work in this case, he will not be able to focus on it to any significant degree until after the 8

January hearing. Accordingly, after consulting with Defendants' counsel, he requests that all future deadlines in this case be extended by one week, as follows:

1. Plaintiffs will file their opposition and cross-motion, if any, on or before January 10, 2025;
2. Defendants will file their reply and opposition to any cross-motion on or before January 31, 2025; and
3. Plaintiffs will file their reply in support of any cross-motion on or before February 14, 2025.

Defendants' counsel has stated that they do not oppose this Motion.

Date: December 30, 2024

Respectfully submitted,

/s/ Kelly B. McClanahan
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Counsel for Plaintiffs

I certify that this memorandum contains 339 words, in compliance with the Local Civil Rules.